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August 5, 2024

VIA ECF AND EMAIL

Hon. Cathy Seibel, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150
chambersnysdseibel@nysd.uscourts.gov

The mediation is stayed. But the request for an extension of the discovery deadline is denied without prejudice to renewal with a better explanation as to why the remaining three months is not sufficient for the completion of fact discovery.

08/06/24

SO ORDERED.

Re: *Valdez v. Wells Fargo Advisors, LLC*
Civil Action No. 7:23-CV-07279 (CS)


CATHY SEIBEL, U.S.D.J.

Dear Judge Seibel:

This Firm represents Defendant Wells Fargo Advisors, LLC (“Defendant” or “Wells Fargo”) in the above referenced matter. Please accept this joint letter from the parties requesting a stay of mediation currently scheduled for August 8, 2024.

Prior to mediation, Defendant requested that Plaintiff provide a revised demand so that the parties could engage in a productive mediation session. Plaintiff provided that revised demand on August 1, 2024. Unfortunately, the parties remain further apart than anticipated, and the parties agree mediation would not be an efficient use of time or resources at this juncture. The parties think additional discovery and depositions may be necessary before mediation.

Although Plaintiff declined to file an amended complaint, the parties anticipate that they will need additional time for discovery. The fact discovery deadline is currently October 30, 2024. In order to allow the parties sufficient time to complete paper discovery, take depositions (the parties estimate 3-5 total depositions) and schedule mediation, the parties request that the end date for fact discovery be extended until December 31, 2024. The parties further request that the Court-Ordered mediation be open through November 2024.

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We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Colleen P. Tandy', with a long horizontal flourish extending to the right.

Colleen P. Tandy

For FISHER & PHILLIPS LLP